

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	No. 20 CR 812
vs.)	
)	Honorable Harry D. Leinenweber
MICHAEL McCLAIN, et al.,)	
)	

DEFENDANTS' JOINT MOTION TO STRIKE SURPLUSAGE FROM INDICTMENT

Defendants Michael McClain, Anne Pramaggiore, John Hooker, and Jay Doherty (collectively "Defendants"), by and through their undersigned counsel and pursuant to Federal Rule of Criminal Procedure 7(d), respectfully move to strike references to the passage of legislation identified in paragraphs 1.o, 1.p, and 1.q of the Indictment. These references should be stricken because they are clearly not relevant and are prejudicial. Defendants file herewith and incorporate by reference their Memorandum of Law in Support.

DATED: September 22, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of September, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Patrick J. Cotter